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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) Case No. CR-06-144-01 JSW
Plaintiff,) **STIPULATION AND JOINT REQUEST
vs.) TO RESCHEDULE SENTENCING
Defendants.) HEARING**

It is hereby stipulated and agreed between the undersigned parties that, pursuant to Criminal Local Rule 32-2(a), the hearings in the above-titled matter for sentencing defendant Rene Medina and for dismissal of charges against defendants Phyllis Cuison and Rawlin Reyes, which are presently scheduled for June 19, 2008 at 2:30 p.m., shall be continued until October 30, 2008 at 2:30 p.m. The reasons for the continuance are set forth in the accompanying Joint Declaration in Support of

1 Stipulated Request to Reschedule Sentencing Hearing, which has been filed under
2 seal.

3 Counsel for Medina, Cuison, Reyes, and the United States will each be available
4 on October 30, 2008 at 2:30 p.m. Likewise, Ms. Arguedas certifies that her office
5 consulted with the United States Probation Office for the Northern District of California.
6 We are advised that Mr. Medina's probation officer, E. Ann Searles, will be available on
7 October 30, 2008 at 2:30 p.m., as well. Judge White's courtroom deputy advises that
8 the proposed date is also available on the Court's calendar.

9 Wherefore, the parties respectfully request that the sentencing hearing be
10 continued until October 30, 2008 at 2:30 p.m.

11 Dated: _____, 2008

/s/ Cristina C. Arguedas

12 Cristina C. Arguedas
13 Arguedas, Cassman & Headley LLP
14 Attorneys for Rene Medina

15 Dated: _____, 2008

/s/ Cynthia Stier

16 Cynthia Stier
17 Assistant United States Attorney
18 Attorneys for the United States of America

19 Dated: _____, 2008

/s/ Ann C. Moorman

20 Ann C. Moorman
21 Law Offices of Ann C. Moorman
22 Attorney for Phyllis Reyes Cuison

23 Dated: _____, 2008

/s/ Lidia Stiglich

Lidia Stiglich
Stiglich & Hinckley LLP
Attorneys for Rawlin Reyes

PURSUANT TO STIPULATION, IT IS SO ORDERED

There shall be no further
continuances.

June 12, 2008

Date



United States District Judge